



Audit of the Office of Justice  
Programs STOP School Violence  
Program Grant Awarded to the Lake  
County Regional Office of Education #34  
Vernon Hills, Illinois



AUDIT DIVISION

25-092

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SEPTEMBER 2025

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# EXECUTIVE SUMMARY

## **Audit of the Office of Justice Programs STOP School Violence Program Grant Awarded to the Lake County Regional Office of Education #34, Vernon Hills, Illinois**

### **Objectives**

The Office of Justice Programs (OJP) awarded the Lake County, Illinois, Regional Office of Education #34 (Lake County ROE) one grant totaling \$1 million for the STOP School Violence Grant Program. The objectives of this audit were to determine whether the Lake County ROE demonstrated adequate progress towards achieving program goals and objectives; and to determine whether costs claimed under the grant were allowable, supported, and in accordance with applicable laws, regulations, guidelines, and terms and conditions of the award.

### **Results in Brief**

As a result of our audit, we concluded that the Lake County ROE demonstrated adequate progress toward achieving the audited grant's goals and objectives. However, we identified several areas of improvement related to grant program administration and financial management, such as missing policies and procedures, procurement practices, and reporting. We also identified \$137,034 in unsupported costs.

### **Recommendations**

Our report contains seven recommendations for OJP to work with the Lake County ROE to improve award management and remedy questioned costs. We requested a response to our draft audit report from the Lake County ROE and OJP. The responses can be found in Appendices 3 and 4, respectively. Our analysis of those responses can be found in Appendix 5.

### **Audit Results**

The purpose of the Lake County ROE's STOP School Violence grant was to improve school security by providing students and teachers with tools to recognize, respond quickly to, and help prevent acts of violence and ensure a positive school climate. The grant's project period was from October 2022 through September 2025. As of August 2025, the Lake County ROE drew down a cumulative amount of \$433,637 for the grant.

### **Program Goals and Accomplishments**

The Lake County ROE demonstrated adequate progress toward achieving the goals and objectives of the grant by implementing a safety panic alert application, a mental health support linkage system, hiring a student success coordinator, and providing training to school staff. However, we noted that the Lake County ROE could take steps to enhance the accurate reporting of activities specific to its grant goals.

### **Grant Financial Management**

We found that the Lake County ROE did not procure a grant-funded contract in accordance with federal requirements. The Lake County ROE awarded the contract as sole source (without competition) yet did not properly justify its decisions. As a result of not complying with federal procurement guidance, we questioned \$137,034 in unsupported costs. In addition, we found that the Lake County ROE lacked adequate policies and procedures in several key grant financial management areas, including employee time tracking and approval, procurement practices, drawdowns, financial reporting, and separately accounting for federal award funds.

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## Introduction

The U.S. Department of Justice (DOJ) Office of the Inspector General (OIG) completed an audit of a grant awarded by the Office of Justice Programs (OJP) Bureau of Justice Assistance (BJA) under the STOP School Violence Grant Program to the Lake County Regional Office of Education #34 (Lake County ROE) in Vernon Hills, Illinois.<sup>1</sup> The Lake County ROE was awarded one grant totaling \$1 million, as shown in Table 1.

Table 1

### Grant Awarded to the Lake County ROE

Award Number	Program Office	Award Date	Project Period Start Date	Project Period End Date	Award Amount
15PBJA-22-GG-04650-STOP	BJA	09/29/2022	10/01/2022	09/30/2025	\$1,000,000

Source: JustGrants

According to BJA, funding through the STOP School Violence Grant Program is designed to improve school security for kindergarten through grade 12 by providing students and teachers with the tools they need to recognize, respond quickly to, and help prevent acts of violence and ensure a positive school climate.

## The Grantee

As defined by the Illinois State Board of Education, a Regional Office of Education helps ensure that every school district has a locally based point of access to numerous support services. At the time of its application for the grant in 2022, the Lake County ROE reported that it directly oversaw more than 200 schools and over 140,000 students in the state of Illinois. Specifically, the Lake County ROE reported that it provides services to 214 public schools, 29 non-public schools, 4 charter schools, and 1 Regional Safe School, as well as administers a virtual school, which is available to all students within the state of Illinois.<sup>2</sup> Further, the Lake County ROE reported that it offers services to over 15,000 teachers, administrators, paraprofessionals, and service personnel. In addition to administering and supporting state-wide resources through a virtual school, the Lake County ROE's website states that it also provides services to the Lake County, Illinois, school system, such as school bus driver training, educator licensure support, home schooling and homeless student resources, and educator fingerprinting.

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<sup>1</sup> According to JustGrants, the legal name of the grantee is Regional Office of Ed 34. For purposes of this audit report, we refer to the grantee as the Lake County ROE.

<sup>2</sup> The Regional Safe School is a school program for disruptive students in grades 6-12 who have received multiple suspensions, are eligible for expulsion, or have been expelled from school. The school provides these students with techniques for improving compliance with school and district discipline codes, school attendance, and academic performance.

## OIG Audit Approach

The objectives of this audit were to determine whether the Lake County ROE demonstrated adequate progress towards achieving the program goals and objectives and to determine whether costs claimed under the grant were allowable, supported, and in accordance with applicable laws, regulations, guidelines, and terms and conditions of the grant. To accomplish these objectives, we assessed performance in the following areas of grant management: program performance, financial management, expenditures, budget management and control, drawdowns, and federal financial reports.

We tested compliance with what we considered to be the most important conditions of the grant. The DOJ Grants Financial Guide; 2 C.F.R. § 200, Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards (Uniform Guidance); and the award documents contain the primary criteria we applied during the audit.

The results of our analysis are discussed in detail later in this report. Appendix 1 contains additional information on this audit's objectives, scope, and methodology. The Schedule of Dollar-Related Findings appears in Appendix 2.

# Audit Results

## Program Performance and Accomplishments

To determine whether the Lake County ROE demonstrated adequate progress towards achieving the program goals and objectives, we reviewed grant documentation, including the application, solicitation, and budget narrative, and interviewed officials from the Lake County ROE and various Lake County school districts. We also reviewed the required semi-annual performance reports and associated supporting documentation, as well as BJA-approved Grant Award Modifications that authorized budget changes. Overall and as detailed below, we determined that the Lake County ROE demonstrated adequate progress towards achieving the program goals of preventing acts of violence and creating a positive school climate by implementing a safety panic alert application, offering a mental health support linkage system, hiring a student success coordinator, providing training to school staff, and offering students a social and emotional learning platform.

## Program Goals and Objectives

In September 2022, BJA awarded the Lake County ROE a grant titled “Preventing School Violence: BJA’s STOP School Violence Program” to: (1) develop and deliver web-based school safety training on preventing school violence that is made available to all schools across Illinois; (2) hire school support personnel to provide intensive support for youth who have been referred to online learning and who may be at a higher risk of harm to self or others; (3) provide intensive support for students attending Safe Schools and/or who have been a part of the juvenile justice system; (4) offer re-entry support through school support personnel for students who are returning from online learning to traditional brick-and-mortar schools after exclusionary discipline, school refusal, mental health, or other reasons; and (5) implement county-wide support through a technology platform where students, staff, and families can ask for and receive mental health and other resources, such as e-therapy or multilingual support.

To assess whether the Lake County ROE has made adequate progress towards the goals of the grant, we looked at the contracted services provided, spoke with school officials, and examined performance data and other supporting documentation. We found that to accomplish the grant goals and objectives, the Lake County ROE established a safety panic alert application, implemented a county-wide online mental health service linkage system, hired a student success coordinator for the virtual school, provided in-person and online training and professional development, and offered students a social and emotional learning platform. In addition, the Lake County Regional Superintendent of Schools stated that the Lake County ROE plans to contract with a provider to develop and implement training for individuals who work with students who exhibit signs of physical aggression and help prevent violence before it occurs. We also spoke with school district officials about their awareness and use of the grant-funded programs. The officials we spoke with were aware of and utilized the grant-funded programs—finding the programs useful to both their students’ and educators’ needs while helping accomplish the goal of reducing school violence. Overall, we concluded that the Lake County ROE demonstrated adequate progress towards accomplishing the grant-related goals and objectives.

Although the Lake County ROE’s efforts were in line with the program goals and objectives, we found that the Lake County ROE did not comply with certain special conditions of the grant. For instance, one of the special conditions required that any website funded in whole or in part by the grant must include a notice of

federal funding with the grant number identified on all major entry pages or on any pages from which a visitor may access or use a web-based service. However, we found that the Lake County ROE published on its website professional development materials that were funded by the grant, yet the Lake County ROE did not include the federal funding notice on the website. Additionally, award recipients were required to submit any training-related materials (e.g., curricula, videos) that will be published with grant funds to BJA for review at least 30 working days prior to the targeted dissemination date, and that these materials should indicate the grant number that funded their creation. However, we found that none of the Lake County ROE's published grant-funded training materials were provided to BJA prior to their dissemination and the materials did not indicate the grant number as required. When we asked Lake County ROE officials about their compliance with this requirement, they stated they did not provide the training materials to BJA. Therefore, BJA did not have a chance to review materials prior to their dissemination, which creates a risk that the grant-funded materials do not meet BJA expectations. As a result of the Lake County ROE's non-compliance with certain special conditions, we recommend that OJP require the Lake County ROE to submit the previously developed and published training materials to BJA for review. Further, we recommend that OJP ensure that the Lake County ROE updates its website and published training materials to include the required funding notice and appropriate grant-related information, respectively.

## Required Performance Reports

According to the DOJ Grants Financial Guide, the funding recipient should ensure that valid and auditable source documentation is available to support all data collected for each performance measure specified in the program solicitation. We requested the Lake County ROE's policies and procedures related to documenting and reporting its grant-related accomplishments. In response, we found that there is a single person who prepares the performance reports, and this individual informed us that the Lake County ROE does not have written policies and procedures for performance reporting.

To verify the information reported in the required semi-annual performance reports, we selected a sample of six performance measures from the three most recent performance reports.<sup>3</sup> We then traced the data reported to supporting documentation maintained by the Lake County ROE. We found that two of the six performance measures we tested were accurately reported, while the other four measures were either inaccurate or mischaracterized. For example, we determined that the number of schools that were noted to need safety assessments was mischaracterized as the performance metric is not relevant to the Lake County ROE's award. Because the Lake County ROE does not perform safety assessments, it instead reported the number of school districts in Lake County that adopted the grant-funded panic alert application. In another example, the Lake County ROE reported receiving three anonymous tips through the safety application but was only able to provide documentation for two of the tips. When discussing the results of our testing, a Lake County ROE official acknowledged that the number of anonymous tips reported was inaccurate and other performance data was mischaracterized. However, this official also stated that the performance report template was not conducive for reporting the Lake County ROE's approved grant activities and, as a result, tried to make the Lake County-specific information apply to the performance report templated categories.

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<sup>3</sup> The performance reports we reviewed covered grant activity from July 1, 2023, to December 31, 2023; January 1, 2024, to June 30, 2024; and July 1, 2024, to December 31, 2024.



We spoke with this grant's BJA grant manager, who stated that grant recipients receive training on performance reporting at the beginning of the grant period. This individual also stated that the STOP School Violence performance report template was designed to allow grant recipients to only report on activities relevant to their approved grant budget and further clarified that if there is a question on the performance report that does not align with a specific grant goal or objective, the grantee should not answer that particular question and instead elaborate on grant accomplishments in the narrative section of the performance report.

While we found instances where the Lake County ROE mischaracterized information for certain performance categories, we also noted that the Lake County ROE thoroughly described its grant accomplishments in the narrative sections of the performance reports. Nonetheless, inaccurate performance reports risk mischaracterizing critical program activities and achievements to key internal and external stakeholders. To ensure the information provided within these reports is accurate and consistent, as well as ensuring the continuity of completing the performance reports in case of staff turnover, the Lake County ROE should have a formalized policy outlining the performance reporting process. Therefore, we recommend that OJP work with the Lake County ROE to develop and implement written policies and procedures that help ensure accurate performance reporting, including specific procedures for completing performance report categories that may not directly align with grant-related activities.

## **Grant Financial Management**

According to the DOJ Grants Financial Guide, all grant recipients and subrecipients are required to establish and maintain adequate accounting systems and financial records and to accurately account for funds awarded to them. To assess whether the Lake County ROE adequately safeguarded the grant funds we audited, we conducted interviews with financial staff, reviewed the Lake County ROE's internal control manual, and tested grant expenditures.

As a result of our expenditure testing, we concluded that the Lake County ROE incorrectly procured one of its four contracts, resulting in \$137,034 in unsupported expenditures. We found that the other grant expenditures we tested were allowable, supported, and properly allocated in compliance with award requirements. Further, we concluded that the Lake County ROE's grant financial management could be improved with enhanced financial policies and procedures related to employee time tracking and benefit calculations, procurement practices, drawdown procedures, federal financial reporting, accounting for funding sources separately, and bank reconciliations. These deficiencies are discussed in more detail in the following sections of this report.

## **Grant Expenditures**

The Lake County ROE's approved grant budget included salary, fringe benefits, and contract services. To determine whether the costs charged to the award were allowable, supported, and properly allocated in compliance with award requirements, we tested a majority of grant-funded expenditures, totaling \$625,686,



which included reviewing supporting documentation and the Lake County ROE's accounting records.<sup>4</sup> The following sections describe the results of our testing.

### ***Salary and Fringe Benefit Costs***

The Uniform Guidance requires that personnel expenses be supported by a system of internal controls, which provides reasonable assurance that the charges are accurate, allowable, and properly allocated. The Lake County ROE used grant funds to pay for the salary and fringe benefit costs of one employee. We reviewed this grant-funded employee's timesheets, associated approvals in the timekeeping software, and paystubs and compared them to the Lake County ROE's general ledger to determine if the payroll costs were allowable, supported, accurate, and authorized. In total, we reviewed 51 payroll transactions totaling \$109,420 in salary costs and \$3,399 in fringe benefit costs, including health insurance and retirement benefits, for the period of July 2023 through April 2025. For each pay period, we verified that the costs charged to the grant generally reconciled to the timesheets and paystubs, with only a few minor discrepancies. Therefore, we concluded that the personnel expenses and associated fringe benefit costs were allowable, supported, accurate, and authorized.

During our testing of personnel and fringe benefit costs, we reviewed the Lake County ROE's written policies and procedures related to timekeeping, and we found that the employee timekeeping policy is vague, as it simply states that an employee is to provide their supervisor with complete and accurate documentation of the employee's biweekly timesheet. Lake County ROE officials told us that timekeeping procedures are covered during new employee training and that there are no additional written policies for tracking employee time. We believe that it is important to have established internal controls regarding tracking and approving timesheets to provide assurance that the charges to the grant are for grant-related activities. As a result, to promote compliance with award requirements and ensure the accuracy of charges to the grant, we recommend that OJP work with the Lake County ROE to develop and implement written policies and procedures regarding the tracking and approval of employee time spent on grant-funded activities.

### ***Contract Services***

To help achieve its grant goal of preventing school violence, the Lake County ROE awarded four contracts for services, which included a safety panic alert application, training and professional development, a social and emotional learning platform, and an online mental health service linkage system. As of April 2025, the Lake County ROE paid \$512,868 for these contract services. To verify that the contract services were supported and allowable, we reviewed all related expenditures and supporting documentation, including the contracts. We found that the contract-related expenditures were supported by invoices and confirmed that the contract services were provided based upon our review of documentation and interviews with Lake County ROE and various school personnel in the area. However, we determined that one of the four contracts was not procured in accordance with the DOJ Grants Financial Guide and the Uniform Guidance,

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<sup>4</sup> Although the Lake County ROE had drawn down \$433,637 at the time of our expenditure testing, it had expended and recorded a total of \$685,619 on grant-related activities as of April 2025. Because the Lake County ROE told us it intended to request a drawdown of the remaining funds during our audit, we tested grant-related expenditures totaling \$625,686. As of August 2025, the Lake County ROE had not drawn down any additional grant funds.

and we noted that the Lake County ROE did not have its own written policies and procedures regarding procurement.

According to the Uniform Guidance and the DOJ Grants Financial Guide, the grantee must maintain and use documented procedures for procurement transactions funded by federal dollars. Further, the Uniform Guidance indicates that purchases over the simplified acquisition threshold (\$250,000) require formal procurement methods. In one instance, the Lake County ROE entered into a contract to provide a panic alert system and virtual platform for which it budgeted a total of \$273,714 over a 3-year span.<sup>5</sup> Although the budgeted amount of the contract exceeded the simplified acquisition threshold, the Lake County ROE did not follow formal procurement methods (e.g., competitive bidding) and awarded the contract as sole source because the contractor had done previous work with other STOP School Violence grant recipients. While federal requirements allow for the awarding of sole source contracts, the Lake County ROE did not have a sole source justification, as required. As of April 2025, the Lake County ROE had charged \$137,034 to the grant for this contract. Because the Lake County ROE did not award this contract in accordance with federal guidelines, we question the \$137,034 spent as unsupported. Therefore, we recommend that OJP remedy the \$137,034 in unsupported costs.

Had the Lake County ROE followed federal requirements for procurement practices, the Lake County ROE may have been able to obtain the contracted services for less. We reviewed the Lake County ROE's internal control manual to determine whether it complies with federal guidance, and we found that the manual does not contain any policies or procedures for procurement. To help ensure future procurement actions follow federal guidelines, we recommend that OJP coordinate with the Lake County ROE to develop and implement written policies and procedures detailing procurement and acquisition practices for federal awards.

## Drawdowns

Grant recipients should request funds based upon immediate disbursement or reimbursement needs, and the grantee should time drawdown requests to ensure that the federal cash on hand is the minimum needed for reimbursements or disbursements made immediately or within 10 days. As of August 2025, the total drawdowns for the Lake County ROE's STOP School Violence grant were \$433,637. To assess whether the Lake County ROE managed grant receipts in accordance with federal requirements, we compared the total amount reimbursed to the total expenditures in the accounting records. Based on our testing, we determined that the total drawdowns for the award did not exceed expenditures recorded in the accounting system, and that drawdowns were sought on a reimbursement basis. At the time of the Lake County ROE's last drawdown (August 2024), the Lake County ROE had charged \$619,143 to the grant; therefore, the total expenditures exceeded the total drawdowns by \$185,506. We spoke with Lake County ROE officials about the excess of grant expenditures not yet drawn down. These officials stated that due to staff turnover, the Lake County ROE had not submitted a drawdown request since August 2024, but that they planned to submit additional drawdown requests to receive reimbursement for all grant expenditures incurred.

During the audit, we did not identify significant deficiencies related to Lake County ROE's process for developing drawdown requests. However, we found that the Lake County ROE did not have written policies and procedures related to drawdowns to ensure compliance with the requirements of the DOJ Grants

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<sup>5</sup> According to the contract, the Lake County ROE agreed to pay a minimum of \$80,000 annually and a maximum of \$220,000 annually.

Financial Guide or the Uniform Guidance. The DOJ Grants Financial Guide and the Uniform Guidance state that written policies and procedures are essential for the establishment of internal controls, which provide reasonable assurance that the recipient is compliant with federal regulations when managing the award. Establishing policies and procedures for completing drawdowns promotes efficiency by helping prevent drawing down incorrect amounts, as well as helps aid in the continued and consistent execution of the process. Therefore, we recommend that OJP work with the Lake County ROE to develop and implement written policies and procedures for preparing and submitting drawdown requests.

## **Federal Financial Reports**

According to the DOJ Grants Financial Guide, recipients shall report the actual expenditures and unliquidated obligations incurred for the reporting period, as well as cumulative expenditures, on each Federal Financial Report (FFR). To determine whether the Lake County ROE submitted accurate FFRs, we compared all 10 FFRs completed as of March 31, 2025, to the Lake County ROE's accounting records. We determined that the reported grant expenditures for three of the reports we reviewed did not match the Lake County ROE's accounting records, resulting in incorrect amounts being reported for grant funds utilized. These errors ranged from underreporting \$3,575 in grant expenditures on two FFRs to overreporting \$1,990 in grant expenditures on another FFR.

We spoke with financial staff at the Lake County ROE about compiling information for the FFRs and found that they do not have written policies or procedures for FFR completion. To become compliant with federal reporting requirements, we believe the Lake County ROE should formalize its process for completing FFRs, which would help ensure accurate reporting. Therefore, we recommend that OJP work with the Lake County ROE to develop and implement written policies and procedures for federal financial reporting. Further, we recommend that OJP work with the Lake County ROE to correct and resubmit, as necessary, its inaccurate FFRs.

## **Separate Tracking of Funds**

We determined that the Lake County ROE did not have written policies and procedures to account for funding sources separately. According to the DOJ Grants Financial Guide, award recipients must establish procedures to account for awarded funds separately. The Lake County ROE receives funding from sources other than the BJA STOP School Violence grant, including other federal and state funding. We spoke with Lake County ROE financial staff who told us that each funding source has a separate code in its financial software to prevent the commingling of funds, but that the Lake County ROE does not have a policy requiring the use of separate codes. The financial staff further stated that they, instead, defer to the Illinois State Board of Education for many accounting policies, including the separation of funds. We reviewed the Illinois State Board of Education code and determined that while the code provides the opportunity for school boards to establish separate funds as applicable to their needs, there is no explicit policy to track federal funds separately from other sources.

Although we did not identify commingling during our audit, we determined that the Lake County ROE's process for separating funds should be formally documented in its internal control manual to comply with federal grant requirements and help ensure the continued and consistent execution of the process. As a result, we recommend that OJP work with the Lake County ROE to formally document its procedures to ensure compliance with the DOJ Grants Financial Guide requirements to track award funds separately.

## **Bank Reconciliations**

According to the Lake County ROE's internal control manual, bank reconciliations are to be performed at the end of every month. However, we noted that the manual lacks specific details on executing the bank reconciliations and monitoring their completion. When we asked about their process for completing bank reconciliations, we learned that the Lake County ROE is years behind on completing them. At the time of our audit, no bank reconciliations involving grant funds covered by our audit had been completed. We spoke to the finance team member responsible for completing bank reconciliations, and they informed us that they assumed their role in the fall of 2024 and learned that their predecessor was not completing reconciliations as expected. As such, this official told us that they began working on completing all historical reconciliations, as well as developing new policies and procedures for performing bank reconciliations.

Without consistent and accurate bank reconciliations, there is no assurance that the Lake County ROE is properly accounting for and safeguarding federal funds, as bank reconciliations serve as a control to identify differences or unauthorized transactions. Therefore, we recommend that OJP work with the Lake County ROE to develop and implement policies and procedures for completing and reviewing bank reconciliations. Further, we recommend that OJP ensure that the Lake County ROE completes historical bank reconciliations for the grant period.

## **Budget Management and Control**

According to the DOJ Grants Financial Guide, the recipient is responsible for establishing and maintaining an adequate accounting system, which includes the ability to compare actual expenditures or outlays with budgeted amounts for each award. Additionally, the grant recipient must initiate a Grant Award Modification for a budget modification that reallocates funds among budget categories if the proposed cumulative change is greater than 10 percent of the total award amount. We compared grant expenditures to the approved budget, including approved Grant Award Modifications, to determine whether the Lake County ROE transferred funds among budget categories in excess of 10 percent. We did not identify any issues with the Lake County ROE's budget management and control.

## Conclusion and Recommendations

As a result of our audit testing, we concluded that the Lake County ROE demonstrated adequate progress towards achieving the grant's stated goals and objectives, such as implementing a mental health support linkage system, instituting a panic alert application, providing training to school staff, and offering students a social and emotional learning platform. However, we found that the Lake County ROE's grant program administration and financial management could be improved. For instance, we determined that the Lake County ROE did not comply with certain special conditions, submitted inaccurate program performance reports, and did not have adequate policies and procedures related to performance reporting. Similarly, related to grant financial management, we found that the Lake County ROE submitted inaccurate FFRs and did not have adequate policies and procedures for critical financial management activities, such as separately tracking award funds, bank reconciliations, employee time tracking and approval, procurement, and drawdowns. In addition, we found that the Lake County ROE did not comply with federal requirements when entering into one grant-funded contract. In total, we provide seven recommendations to OJP to address these deficiencies and help improve Lake County ROE's grant management practices. Moreover, we identified \$137,034 in questioned costs.

We recommend that OJP:

1. Require the Lake County ROE to submit the developed training materials that were published to BJA for review.
2. Ensure the Lake County ROE updates its website and published materials to include the required funding notice and appropriate grant-related information.
3. Ensure the Lake County ROE develops and implements written policies and procedures that facilitate accurate performance reporting, including specific procedures for completing performance report categories that may not directly align with grant-related activities.
4. Remedy \$137,034 in unsupported costs for the contract that did not comply with federal requirements.
5. Work with the Lake County ROE to develop and implement grant financial management policies and procedures to help ensure adequate administration of federal grant funds. In particular, these policies and procedures should cover, at a minimum: (1) the tracking and approval of employee time, (2) procurement and acquisition practices for federal awards, (3) preparing and submitting drawdown requests and FFRs, (4) the requirement to track award funds separately, and (5) the process for completing and reviewing bank reconciliations.
6. Ensure the Lake County ROE corrects and resubmits, as necessary, its inaccurate FFRs.
7. Ensure the Lake County ROE completes historical bank reconciliations for the grant period.

# **APPENDIX 1: Objectives, Scope, and Methodology**

## **Objectives**

The objectives of this audit were to determine whether costs claimed under the grant were allowable, supported, and in accordance with applicable laws, regulations, guidelines, and terms and conditions of the grant; and to determine whether the grantee demonstrated adequate progress towards achieving the program goals and objectives. To accomplish these objectives, we assessed performance in the following areas of grant management: program performance, financial management, expenditures, budget management and control, drawdowns, and federal financial reports.

## **Scope and Methodology**

We conducted this performance audit in accordance with generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

This was an audit of an Office of Justice Programs (OJP) grant awarded to the Lake County, Illinois, Regional Office of Education #34 (Lake County ROE) under the Bureau of Justice Assistance (BJA) STOP School Violence Grant Program. OJP awarded one grant totaling \$1,000,000, and as of August 2025, the Lake County ROE had drawn down \$433,637 of the total grant funds awarded. Our audit concentrated on, but was not limited to, the period of October 2022 through August 2025.

To accomplish our objectives, we tested compliance with what we consider to be the most important conditions of Lake County ROE's activities related to the audited grant. We tested all expenditures related to salary and contracts, as well as all drawdowns and federal financial reports. We performed sample-based audit testing for performance reporting and fringe benefit costs. In this effort, we employed a judgmental sampling design to obtain broad exposure to numerous facets of the grant reviewed. This non-statistical sample design did not allow projection of the test results to the universe from which the sample was selected. The DOJ Grants Financial Guide; 2 C.F.R. § 200, Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards (Uniform Guidance); and the award documents contain the primary criteria we applied during the audit.

During our audit, we obtained information from DOJ's JustGrants system and Lake County ROE's accounting system specific to the management of DOJ funds during the audit period. We did not test the reliability of those systems as a whole; therefore, any findings identified involving information from those systems were verified with documentation from other sources.

## **Internal Controls**

In this audit, we performed testing of internal controls significant within the context of our audit objectives. We did not evaluate the internal controls of the Lake County ROE to provide assurance on its internal control structure as a whole. The Lake County ROE's management is responsible for the establishment and

maintenance of internal controls in accordance with the Uniform Guidance. Because we do not express an opinion on the Lake County ROE's internal control structure as a whole, we offer this statement solely for the information and use of the Lake County ROE and OJP.<sup>6</sup>

We interviewed Lake County ROE officials, reviewed existing policies and procedures, and evaluated supporting documentation. We assessed management's design of significant internal controls and identified deficiencies that we believe could affect the Lake County ROE's ability to effectively operate, and to ensure compliance with laws and regulations. The internal control deficiencies we found are discussed in the Audit Results section of this report. However, because our review was limited to those internal control components and underlying principles that we found significant to the objectives of this audit, it may not have disclosed all internal control deficiencies that may have existed at the time of this audit.

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<sup>6</sup> This restriction is not intended to limit the distribution of this report, which is a matter of public record.



## APPENDIX 2: Schedule of Dollar-Related Findings

<u>Description</u>	<u>Amount</u>	<u>Page</u>
<b>Questioned Costs:<sup>7</sup></b>		
Unsupported Contract Costs	\$137,034	7
<b>Total Unsupported Costs</b>	<b>\$137,034</b>	
<b>TOTAL DOLLAR-RELATED FINDINGS</b>	<b><u>\$137,034</u></b>	

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<sup>7</sup> **Questioned Costs** are expenditures that do not comply with legal, regulatory, or contractual requirements; are not supported by adequate documentation at the time of the audit; or are unnecessary or unreasonable. Questioned costs may be remedied by offset, waiver, recovery of funds, the provision of supporting documentation, or contract ratification, where appropriate.

## **APPENDIX 3: The Lake County Regional Office of Education Response to the Draft Audit Report**

**TO:** U.S. Department of Justice Office of the Inspector General

**FROM:** Dr. Michael Karner, Regional Superintendent of Schools

**DATE:** September 12, 2025

**SUBJECT:** Response to Draft Audit Report – STOP School Violence Program Grant

The Lake County Regional Office of Education (ROE) appreciates the opportunity to review the draft audit report regarding our administration of federal grant funds. We are committed to implementing strong internal controls, ensuring compliance with all applicable federal requirements, and improving our financial and program management practices.

We are encouraged that the audit concluded that the ROE made adequate progress toward achieving the grant's stated goals and objectives, including implementing a mental health support linkage system, instituting a panic alert application, training school staff, and providing students access to a social and emotional learning platform. At the same time, we acknowledge the deficiencies identified in program administration and financial management, and we take these matters seriously.

In November 2024, the ROE hired new financial management leadership. Upon assuming this role, leadership identified that the prior administration lacked adequate policies and procedures to support compliance and sound financial oversight. In coordination with the Regional Superintendent, the ROE restructured its finance team, hired experienced and reputable financial personnel, and engaged with a public accounting firm to complete and enhance fiscal policies and procedures. These corrective actions have already resulted in stronger financial oversight and provide the foundation for fully addressing the audit's recommendations.

### **Responses to Recommendations**

1. **Submit developed training materials to BJA for review**  
The ROE will submit all training materials developed under the grant to BJA for review and approval.
2. **Update website and published materials**  
The ROE will update its website and will ensure that all published materials include the required federal funding acknowledgement and appropriate grant-related information.
3. **Develop and implement policies and procedures for accurate performance reporting**  
The ROE is developing comprehensive written policies and procedures to ensure accurate performance reporting, including detailed guidance for completing report categories that may not directly align with grant activities.
4. **Remedy \$137,034 in unsupported contract costs**

The ROE will work with OJP to resolve the questioned costs. Supporting documentation will be submitted where available, and any unallowable costs will be addressed in accordance with OJP guidance.

**5. Develop and implement grant financial management policies and procedures**

The ROE is finalizing updated financial management policies and procedures that address:

- Tracking and approval of employee time
- Procurement and acquisition practices for federally funded activities
- Preparation and submission of drawdown requests and FFRs
- Separate tracking of award funds
- Completion and review of bank reconciliations

These policies and procedures will be fully implemented to strengthen internal controls and ensure compliance.

**6. Correct and resubmit inaccurate FFRs**

The ROE is reviewing all previously submitted FFRs and will make corrections and resubmissions as necessary in consultation with OJP.

**7. Complete historical bank reconciliations**

The ROE is in the process of completing historical bank reconciliations for the grant period and will provide documentation of completion to OJP.

## **Conclusion**

The Lake County ROE is committed to addressing each of the audit's recommendations and strengthening its grant administration and financial management practices. With new financial leadership, a restructured finance team, and the engagement of an external public accounting firm, we have already made substantial progress in enhancing fiscal oversight and compliance. We look forward to continued collaboration with OJP and the Office of the Inspector General as we finalize corrective actions and ensure the highest standards of accountability.

**Dr. Michael Karner**

Regional Superintendent of Schools

Lake County Regional Office of Education

## APPENDIX 4: The Office of Justice Programs Response to the Draft Audit Report



U.S. Department of Justice

Office of Justice Programs

Office of Audit, Assessment, and Management

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Washington, D.C. 20531

September 18, 2025

MEMORANDUM TO: Todd A. Anderson  
Regional Audit Manager  
Chicago Regional Audit Office  
Office of the Inspector General

FROM: Iyauta I. Green  
Director

Iyauta Iyeesha Green

Digitally signed by Iyauta Iyeesha Green  
Date: 2025.09.18 11:28:35 -0400

SUBJECT: Response to the Draft Audit Report, *Audit of the Office of Justice Programs STOP School Violence Program Grant Awarded to the Lake County Regional Office of Education #34*

This memorandum is in reference to your correspondence, dated August 28, 2025, transmitting the above-referenced draft audit report for the Lake County Regional Office of Education #34 (Lake County ROE). We consider the subject report resolved and request written acceptance of this action from your office.

The draft report contains seven recommendations and \$137,304 in questioned costs. The following is the Office of Justice Programs' (OJP) analysis of the draft audit report recommendations. For ease of review, the recommendations are restated in bold and are followed by OJP's response.

1. **We recommend that OJP require the Lake County ROE to submit the developed training materials that were published to BJA for review.**

OJP agrees with the recommendation. In its response, dated September 12, 2025, the Lake County ROE stated that it would submit all training materials developed under the grant to OJP's Bureau of Justice Assistance (BJA) for review and approval.

Accordingly, we will coordinate with the Lake County ROE to obtain evidence that BJA reviewed and approved the training materials that were developed under Grant Number 15PBJA-22-GG-04650-STOP.

2. **We recommend that OJP ensure the Lake County ROE updates its website and published materials to include the required funding notice and appropriate grant-related information.**

OJP agrees with the recommendation. In its response, dated September 12, 2025, the Lake County ROE stated that it would update its website and ensure that all published materials include the required federal funding acknowledgement and appropriate grant-related information.

Accordingly, we will coordinate with the Lake County ROE to obtain evidence that it updated its website and published materials to include the required funding notice and appropriate grant-related information.

3. **We recommend that OJP ensure the Lake County ROE develops and implements written policies and procedures that facilitate accurate performance reporting, including specific procedures for completing performance report categories that may not directly align with grant-related activities.**

OJP agrees with the recommendation. In its response, dated September 12, 2025, the Lake County ROE stated that it was developing comprehensive written policies and procedures to ensure accurate performance reporting, including detailed guidance for completing report categories that may not directly align with grant activities.

Accordingly, we will coordinate with the Lake County ROE to obtain a copy of its written policies and procedures, developed and implemented, to facilitate accurate performance reporting, including specific procedures for completing performance report categories that may not directly align with grant-related activities.

4. **We recommend that OJP remedy \$137,034 in unsupported costs for the contract that did not comply with federal requirements.**

OJP agrees with the recommendation. In its response, dated September 12, 2025, the Lake County ROE stated that it would work with OJP to resolve the questioned costs. In addition, the Lake County ROE stated that available supporting documentation would be submitted, and any unallowable costs would be addressed in accordance with OJP guidance.

Accordingly, we will review the \$137,034 in questioned costs, related to unsupported contract costs that were charged to Grant Number 15PBJA-22-GG-04650-STOP, and will work with the Lake County ROE to remedy the costs, as appropriate.



5. **We recommend that OJP work with the Lake County ROE to develop and implement grant financial management policies and procedures to help ensure adequate administration of federal grant funds. In particular, these policies and procedures should cover, at a minimum: (1) the tracking and approval of employee time, (2) procurement and acquisition practices for federal awards, (3) preparing and submitting drawdown requests and FFRs, (4) the requirement to track award funds separately, and (5) the process for completing and reviewing bank reconciliations.**

OJP agrees with the recommendation. In its response, dated September 12, 2025, the Lake County ROE stated that it was finalizing updated financial management policies and procedures that address:

- Tracking and approval of employee time
- Procurement and acquisition practices for federally funded activities
- Preparation and submission of drawdown requests and Federal Financial Reports (FFRs)
- Separate tracking of award funds
- Completion and review of bank reconciliations

In addition, the Lake County ROE stated that the policies and procedures would be fully implemented to strengthen internal controls and ensure compliance.

Accordingly, we will coordinate with the Lake County ROE to obtain a copy of its revised written policies and procedures, developed and implemented, to ensure adequate administration of federal grant funds. At a minimum, the policies and procedures will cover: (1) the tracking and approval of employee time, (2) procurement and acquisition practices for federal awards, (3) preparing and submitting drawdown requests and FFRs, (4) the requirement to track award funds separately, and (5) the process for completing and reviewing bank reconciliations.

6. **We recommend that OJP ensure the Lake County ROE corrects and resubmits, as necessary, its inaccurate FFRs.**

OJP agrees with the recommendation. In its response, dated September 12, 2025, the Lake County ROE stated that it was reviewing all previously submitted FFRs and would make corrections and resubmissions, as necessary, in consultation with OJP.

Accordingly, we will coordinate with the Lake County ROE to obtain evidence that it corrected and resubmitted, as necessary, its inaccurate FFRs.

7. We recommend that OJP ensure the Lake County ROE completes historical bank reconciliations for the grant period.

OJP agrees with the recommendation. In its response, dated September 12, 2025, the Lake County ROE stated that it was in the process of completing historical bank reconciliations for the grant period and would provide documentation of completion to OJP.

Accordingly, we will coordinate with the Lake County ROE to obtain evidence that it completed historical bank reconciliations for the grant period.

We appreciate the opportunity to review and comment on the draft audit report. If you have any questions or require additional information, please contact me on (202) 820-6807.

cc: Maureen A. Henneberg  
Deputy Assistant Attorney General

LeToya A. Johnson  
Senior Advisor  
Office of the Assistant Attorney General

Tammie Gregg  
Acting Director  
Bureau of Justice Assistance

Michelle Garcia  
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Bureau of Justice Assistance

Jonathan Faley  
Associate Deputy Director  
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Associate Deputy Director  
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Associate Deputy Director  
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Michael Botner  
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cc: Chris Casto  
Management and Program Analyst  
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Danielle Whitestone  
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Jorge L. Sosa  
Director, Office of Operations – Audit Division  
Office of the Inspector General

OJP Executive Secretariat  
Control Number OCOM001663

## **APPENDIX 5: The Office of the Inspector General Analysis and Summary of Actions Necessary to Close the Audit Report**

The U.S. Department of Justice Office of the Inspector General (OIG) provided a draft of this audit report to the Office of Justice Programs (OJP) and the Lake County, Illinois, Regional Office of Education #34 (Lake County ROE). Lake County ROE's response is incorporated in Appendix 3 and OJP's response is incorporated in Appendix 4 of this final report. In response to our draft audit report, OJP agreed with our recommendations; as a result, the status of the audit report is resolved. The Lake County ROE did not state whether it agreed or disagreed with the recommendations in its response, but the Lake County ROE's response states actions being taken to address the recommendations. The following provides the OIG analysis of the responses and summary of actions necessary to close the report.

### **Recommendations for OJP:**

- 1. Require the Lake County ROE to submit the developed training materials that were published to the Bureau of Justice Assistance (BJA) for review.**

Resolved. OJP agreed with our recommendation. OJP stated in its response that it will coordinate with the Lake County ROE to obtain evidence that BJA reviewed and approved the training materials that were developed under the grant. As a result, this recommendation is resolved.

The Lake County ROE stated in its response that all training materials developed under the grant will be submitted to BJA for review and approval.

This recommendation can be closed when we receive evidence that the Lake County ROE submitted all training materials developed under the grant to BJA for review.

- 2. Ensure the Lake County ROE updates its website and published materials to include the required funding notice and appropriate grant-related information.**

Resolved. OJP agreed with our recommendation. OJP stated in its response that it will coordinate with the Lake County ROE to obtain evidence that the Lake County ROE updated its website and published materials to include the required funding notice and appropriate grant-related information. As a result, this recommendation is resolved.

The Lake County ROE stated in its response that it will update its website and ensure that all published materials include the required federal funding acknowledgement and appropriate grant-related information.

This recommendation can be closed when we receive evidence that the Lake County ROE updated its website and published materials to include the required funding notice and appropriate grant-related information.

3. **Ensure the Lake County ROE develops and implements written policies and procedures that facilitate accurate performance reporting, including specific procedures for completing performance report categories that may not directly align with grant-related activities.**

Resolved. OJP agreed with our recommendation. OJP stated in its response that it will coordinate with the Lake County ROE to obtain a copy of the Lake County ROE's written policies and procedures, developed and implemented, to facilitate accurate performance reporting, including specific procedures for completing performance report categories that may not directly align with grant-related activities. As a result, this recommendation is resolved.

The Lake County ROE stated in its response that it is developing comprehensive written policies and procedures to ensure accurate performance reporting, including detailed guidance for completing report categories that may not directly align with grant activities.

This recommendation can be closed when we receive evidence that the Lake County ROE developed and implemented written policies and procedures to facilitate accurate performance reporting, including for report categories that may not directly align with grant activities.

4. **Remedy \$137,034 in unsupported costs for the contract that did not comply with federal requirements.**

Resolved. OJP agreed with our recommendation. OJP stated in its response that it will review the \$137,034 in questioned costs and will work with the Lake County ROE to remedy the costs, as appropriate. As a result, this recommendation is resolved.

The Lake County ROE stated in its response that it will work with OJP to resolve the questioned costs—submitting any available supporting documentation and addressing any unallowable costs in accordance with OJP guidance.

This recommendation can be closed when we receive evidence that OJP has remedied the \$137,034 in unsupported costs for the contract that did not comply with federal requirements.

5. **Work with the Lake County ROE to develop and implement grant financial management policies and procedures to help ensure adequate administration of federal grant funds. In particular, these policies and procedures should cover, at a minimum: (1) the tracking and approval of employee time, (2) procurement and acquisition practices for federal awards, (3) preparing and submitting drawdown requests and federal financial reports (FFR), (4) the requirement to track award funds separately, and (5) the process for completing and reviewing bank reconciliations.**

Resolved. OJP agreed with our recommendation. OJP stated in its response that it will coordinate with the Lake County ROE to obtain a copy of the Lake County ROE's revised written policies and procedures, developed and implemented, to ensure adequate administration of federal grant funds. As a result, this recommendation is resolved.

The Lake County ROE stated in its response that it is finalizing updated financial management policies and procedures that address: (1) tracking and approval of employee time, (2) procurement and acquisition practices for federally funded activities, (3) preparation and submission of drawdown requests and FFRs, (4) separate tracking of award funds, and (5) completing and reviewing bank reconciliations.

This recommendation can be closed when we receive evidence that the Lake County ROE developed and implemented grant financial management policies and procedures that cover, at a minimum: (1) tracking and approval of employee time, (2) procurement and acquisition practices for federally funded activities, (3) preparation and submission of drawdown requests and FFRs, (4) the requirement to track award funds separately, and (5) completing and reviewing bank reconciliations.

**6. Ensure the Lake County ROE corrects and resubmits, as necessary, its inaccurate FFRs.**

Resolved. OJP agreed with our recommendation. OJP stated in its response that it will coordinate with the Lake County ROE to obtain evidence that the Lake County ROE corrected and resubmitted, as necessary, its inaccurate FFRs. As a result, this recommendation is resolved.

The Lake County ROE stated in its response that it is reviewing all previously submitted FFRs and, in consultation with OJP, will make corrections and resubmit, as necessary.

This recommendation can be closed when we receive evidence that the Lake County ROE corrected and resubmitted, as necessary, its inaccurate FFRs.

**7. Ensure the Lake County ROE completes historical bank reconciliations for the grant period.**

Resolved. OJP agreed with our recommendation. OJP stated in its response that it will coordinate with the Lake County ROE to obtain evidence that the Lake County ROE completed historical bank reconciliations for the grant period. As a result, this recommendation is resolved.

The Lake County ROE stated in its response that it is in the process of completing historical bank reconciliations for the grant period and will provide OJP documentation once completed.

This recommendation can be closed when we receive evidence that the Lake County ROE completed historical bank reconciliations for the grant period.